

CERTIFICATE OF SERVICE

I, Lizette A. Figueroa, declare:

I am a citizen of the United States of America, over the age of eighteen years and not a party to the within proceeding. I am employed by the Office of the County Counsel, County of Alameda. My business address is 1221 Oak Street, Suite 450, Oakland, California 94612, which is located in the city where the below described service occurred.

I hereby certify that I electronically filed the foregoing:

1. *Defendant's Response to Plaintiff's Rule 28(j) Letter;*
2. *Defendant's Additional Response to Plaintiff's Rule 28(j) Letter; and*
3. *Letter to Court Clerk regarding recent Supreme Court Decision in Friedman v. City of Highland Park, III.*

with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system on December 17, 2015.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on December 17, 2015, at Oakland, California.

/s/ *Lizette A. Figueroa*
LIZETTE A. FIGUEROA
Civil Legal Secretary